### **LOCAL BANKRUPTCY FORM 3015-1**

# IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	CHAPTER 13
DOUGLAS STEPHEN TAYLOR and NOELLE DENISE TAYLOR	CASE NO. 1:22-BK-00900-HWV
	ORIGINAL PLAN 2nd AMENDED PLAN (indicate 1 <sup>st</sup> , 2 <sup>nd</sup> 3 <sup>rd</sup> , etc.)
	0 number of Motions to Avoid Liens 0 number of Motions to Value Collateral

## **CHAPTER 13 PLAN**

### NOTICES

Debtors must check one box on each line to state whether or not the plan includes each of the following items. If an item is checked as "Not Included" or if both boxes are checked or if neither box is checked, the provision will be ineffective if set out later in the plan.

1	The Plan contains nonstandard provisions, set out in §9, which are not		
	included in the standard Plan as approved by the US Bankruptcy Court		☐ Not Included
	for the Middle District of Pennsylvania.		
2	The Plan contains a limit on the amount of a secured claim, set out in		
	§2.E, which may result in a partial payment or no payment at all to the	$\square$ Included	
	secured creditor.		
3	The Plan avoids a judicial lien or nonpossessory, nonpurchase-money	☐ Included	
	security interest, set out in §2.G.		≥ INOU IIICIUUCU

### YOUR RIGHTS WILL BE AFFECTED

READ THIS PLAN CAREFULLY. If you oppose any provision of this Plan, you must file a timely written objection. This Plan may be confirmed and become binding on you without further notice or hearing unless a written objection is filed before the deadline stated on the Notice issued in connection with the filing of the Plan.

### 1. PLAN FUNDING AND LENGTH OF PLAN

### A. Plan Payments from Future Income

1. To date, the Debtor paid \$1,928.93 (\$0 if no payments have been made to the Trustee to date). Debtor shall pay to the Trustee for the remaining term of the Plan the following payments. If applicable, in addition to monthly Plan payments, Debtor shall make conduit payments through the Trustee as set forth below. The total base Plan is \$66,946.93 plus other payments and property stated in \$1B below:

Start mm/yyyy	End mm/yyyy	Plan Payment	Estimated Conduit Payment	Total Monthly Payment	Total Payment Over Plan Tier
09/2022	05/2027	\$1,121.00	\$0.00	\$1,121.00	\$65,018.00
				Total Payments:	\$66,946.93

- 2. If the Plan provides for conduit mortgage payments, and the mortgagee notifies the Trustee that a different payment is due, the Trustee shall notify the Debtor and any attorney for the Debtor, in writing, to adjust the conduit payment and the Plan funding. Debtor must pay all post-petition mortgage payments that have come due before the initiation of conduit mortgage payments.
- 3. Debtor shall ensure that any wage attachments are adjusted when necessary to conform to the terms of the Plan.

### 4. CHECK ONE:

□ Debtor is at or under median income. *If this line is checked, the rest of §1.A.4 need not be completed or reproduced.* 

☑ Debtor is over median income. Debtor estimates that a minimum of \$85,612.80 must be paid to allowed unsecured creditors in order to comply with the Means Test.

# B. Additional Plan Funding from Liquidation of Assets/Other

1. The Debtor estimates that the liquidation value of this estate is \$7,926.00. (Liquidation value is calculated as the value of all non-exempt assets after the deduction of valid liens and encumbrances is before the deduction of Trustee fees and priority claims.)

#### CHECK ONE:

 $\boxtimes$  No assets will be liquidated. *If this line is checked, skip §1.B.2 and complete §1.B.3, if applicable.*  $\square$  Certain assets will be liquidated as follows:

- 2. In addition to the above specified Plan payments, Debtor shall dedicate to the Plan proceeds in the estimated amount of \$0.00 from the sale of property known and designated as . All sales shall be completed by , 20 . If the property does not sell by the date specified, then the disposition of the property shall be as follows:
- 3. Other payments from any source(s) (describe specifically) shall be paid to the Trustee as follows: Any nonexempt recovery form debtor's potential workers comp claim.

### 2. SECURED CLAIMS

### A. Pre-Confirmation Distributions Check One

⊠ None. If "None" is checked, the rest of §2.A need not be completed or reproduced.

□ Adequate protection and conduit payments in the following amounts will be paid by the Debtor to the Trustee. The Trustee will disburse these payments for which a Proof of Claim has been filed as soon as practicable after receipt of said payments from the Debtor.

Name of Creditor	Last Four Digits of Account Number	Estimated Monthly Payment
	Number	Payment

- 1. The Trustee will not make a partial payment. If the Debtor makes a partial Plan payment, or if it is not paid on time and the Trustee is unable to pay timely a payment due on a claim in this section, the Debtor's cure of this default must include any applicable late charges.
- 2. If a mortgagee files a notice pursuant to Fed. R. Bankr. P. 3002.1(b), the change in the conduit payment to the Trustee will not require modification of this Plan.

# B. Mortgages (Including Claims Secured by Debtor's Principal Residence) and Other Direct Payments by Debtor Check One

□ None. If "None" is checked, the rest of §2.B need not be completed or reproduced.

□ Payments will be made by the Debtor directly to the Creditor according to the original contract terms, and without modification of those terms unless otherwise agreed to by the contracting parties.

All liens survive the Plan if not avoided or paid in full under the Plan.

Name of Creditor	Description of Collateral	Last Four Digits of Account Number
Nationstar Mortgage, LLC	407 Pauline Drive Red Lion, PA 17356	8502
PSECU	2019 Honda Pilot	0001
PSECU	2018 Dodge Challenger	0002
Fulton Bank, NA	2018 Nissan Altima	0624
Citadel Credit Union	2018 Toyota Corolla	0001
Ally Financial, Inc.	2019 Jeep Renegade	4928

# C. Arrears (Including, but not limited to, Claims Secured by Debtor's Principal Residence) Check One

⊠ None. *If "None" is checked, the rest of §2.C need not be completed or reproduced.* 

☐ The Trustee shall distribute to each Creditor set forth below the amount of arrearages in the allowed claim. If post-petition arrears are not itemized in an allowed claim, they shall be paid in the amount stated below. Unless otherwise ordered, if relief from the automatic stay is granted as to any collateral listed in this section, all payments to the Creditor as to that collateral shall cease, and the claim will no longer be provided for under §1322(b)(5) of the Bankruptcy Code:

Name of Creditor	Description of Collateral	Estimated Pre- Petition Arrears to be Cured	Estimated Post-Petition Arrears to be Cured	Estimated Total to be Paid in Plan

# D. Other Secured Claims (Conduit Payments and Claims for Which a §506 Valuation is Not Acceptable, etc.) Check One

 $\boxtimes$  None. If "None" is checked, the rest of §2.D need not be completed or reproduced.

- ☐ The claims below are secured claims for which a §506 valuation is not applicable, and can include: (1) claims that were either (a) incurred within 910 days of the petition dated and secured by a purchase money security interest in a motor vehicle acquired for the personal use of the Debtor, or (b) incurred within one year of the petition date and secured by a purchase money security interest in any other thing of value; (2) conduit payments; or (3) secured claims not provided for elsewhere.
- 1. The allowed secured claims listed below shall be paid in full and their liens retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law discharge under §1328 of the Code.
- 2. In addition to payments of the allowed secured claim, present value interest pursuant to 11 U.S.C §1325(a)(5)(B)(ii) will be paid at the rate and in the amount listed below, unless an objection is raised. If an objection is raised, then the Court will determine the present value interest rate and amount at the Confirmation Hearing.

3. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Principal Balance of Claim	Interest Rate	Total to be Paid in Plan

## E. Secured Claims for Which a §506 Valuation is Applicable Check One

⊠ None. If "None" is checked, the rest of §2.E need not be completed or reproduced.

□ Claims listed in the subsection are debts secured by property not described in §2.D of this Plan. These claims will be paid in the Plan according to modified terms, and liens retained until the earlier of the payment of the underlying debt determined under nonbankruptcy law or discharge under §1328 of the Code. The excess of the Creditor's claim will be treated as an unsecured claim. Any claim listed

of the Code. The excess of the Creditor's claim will be treated as an unsecured claim. Any claim listed as "\$0.00" or "NO VALUE" in the "Modified Principal Balance" column below will be treated as an unsecured claim. The liens will be avoided or limited through the Plan or Debtor will file an adversary or other action (select method in last column). To the extent not already determined, the amount, extent or validity or the allowed secured claim for each claim listed below will be determined by the Court at the Confirmation Hearing. Unless otherwise ordered, if the claimant notifies the Trustee that the claim was paid, payments on the claim shall cease.

Name of Creditor	Description of Collateral	Value of Collateral (Modified Principal)	Interest Rate	Total Payment	Plan, Adversary, or Other Action

### F. Surrender of Collateral Check One

 $\square$  None. If "None" is checked, the rest of §2.F need not be completed or reproduced.

⊠ The Debtor elects to surrender to each Creditor listed below in the collateral that secures the Creditor's claim. The Debtor requests that upon confirmation of this Plan or upon approval of any modified plan, the stay under 11 U.S.C. §362(a) be terminated as to the collateral only and that the stay under §1301 be terminated in all respects. Any allowed unsecured claim resulting from the disposition of the collateral will be treated in Part 4 below.

Name of Creditor	Description of Collateral to be Surrendered
Mariner Finance	Various Personal Items

- **G.** <u>Lien Avoidance</u> Do not use for mortgages or for statutory liens, such as tax liens. Check One of the Following Lines
  - ⊠ None. If "None" is checked, the rest of §2.B need not be completed or reproduced.
  - ☐ The Debtor moves to void the following judicial and/or nonpossessory, nonpurchase money liens of the following creditors pursuant to §522(f) (this § should not be used for statutory or consensual liens such as mortgages).

Name of Lien Holder	·

Lien Description	
for Judicial Liens, include court and docket number	
Description of Liened Property	
Liened Asset Value	
Sum of Senior Liens	
Exemption Claim	
Amount of Lien	
Amount Avoided	

### 3. PRIORITY CLAIMS

## A. Administrative Claims

- 1. <u>Trustee's Fees</u>. Percentage fees payable to the Trustee will be paid at the rate fixed by the United States Trustee.
- 2. Attorney's Fees. Complete Only One of the Following Options
  - a. In addition to the retainer of \$0.00 already paid by the Debtor, the amount of \$4,672.00 in the Plan. This represents the unpaid balance of the presumptively reasonable fee specified in LBR 2016-2(c); or
  - b. \$0.00 per hour, with the hourly rate to be adjusted in accordance with the terms of the written fee agreement between Debtor and the Attorney. Payment of such lodestar compensation shall require a separate fee application with the compensation approved by the Court pursuant to LBR 2016-2(b).
- 3. Other. Other administrative claims not included in §§3.A.1 or 3.A.2 above. Check One

$\boxtimes$ None.	<i>If "None"</i>	' is checked,	the rest o	f §3.A.3	need not	be compl	leted of	r reprod	исеа
$\Box$ The fo	ollowing ad	ministrative	claims w	ill be pa	id in full:				

Name of Creditor	Estimated Total Payment

### **B.** Priority Claims (including certain Domestic Support Obligations)

Allowed unsecured claims entitled to priority under §1322(a) will be paid in full unless modified under §9

Name of Creditor	Estimated Total Payment
PA Department of Revenue	\$4,705.88

# C. <u>Domestic Support Obligations Assigned to or Owed to a Governmental Unit Under 11 U.S.C.</u> §507(1)(a)(B) Check *One*

	TC ((3) T 1) 1 1 1 1	.1	1 1 1 1 1
IXI None	It "None" is checked	the rest of 83 ( need not	he completed or reproduced

	The	allowed	priority	claims	listed	below	are	based	on a	domestic	support	obligation	that	has	been
ass	ignec	d to or is	owed to	a gover	nment	al unit	and	will be	e paid	less than	the full a	mount of tl	he cla	im.	This
Plc	ın pro	ovision i	requires t	hat pay	ments	in §1.A	bej	for a te	rm of	<sup>c</sup> 60 month	s (see 11	U.S.C. §13	322(a	)(4))	).

	Name of Cr	Estimated Total Payment					
4. UNSECURED	CLAIM						
A. Claims	of Unsecured Non	oriority Credit	tors Specially	Classifi	ed Chec	k One	
☐ To the co-signe	e. If "None" is checate extent that funds and unsecured debts, erest at the rate state oly.	are available, twill be paid be	the allowed and efore other, un	nount of aclassifie	the follo	owing unsecured ured claims. The	ne claim shall be
Name of Creditor Reason for Special An				Amou	nated Interest Estimate Total Paymer		
	e. If "None" is checolollowing contracts a ed:	•	=	-		•	ured in the Plan
Name of Other Party  Description of Contract or Lease		Monthly Payment	Interest Rate		nated ears	Total Plan Payment	Assume or Reject
	PROPERTY OF T		on: Check the	 Applical	ole Line		
⊠ Entry	Confirmation of Discharge ng of Case						
7. DISCHARGE	Check One						
$\Box$ The	Debtor will seek a d Debtor is not eligi d in §1328(f).				tor has	previously recei	ved a discharge

#### 8. ORDER OF DISTRUBITION

If a pre-petition Creditor files a secured, priority or specifically classified claim after the bar date, the Trustee will treat the claim as allowed, subject to objection by the Debtor.

Payment	s from the Plan will be made by the Trustee in the following order:
Level 1:	
Level 3:	
Level 4:	

If the above levels are filled in, the rest of §8 need not be completed or produced. If the above levels are not filledin, then the Order of Distribution of Plan payments will be determined by the Trustee using the following as a guide:

Level 1: adequate protection payments

Level 2: Debtor's attorney's fees

Level 3: Domestic Support Obligations

Level 4: priority claims, pro rata

Level 5: secured claims, pro rata

Level 6: specifically classified unsecured claims

Level 7: timely filed general unsecured claims

Level 8: untimely filed general unsecured claims to which the Debtor has not objected

### 9. NONSTANDARD PLAN PROVISIONS

Include the additional provisions below or on an attachment. Any nonstandard provision placed elsewhere in the Plan is void. (NOTE: The Plan and any attachment must be filed as one document, not as a Plan and Exhibit.)

Debtor(s) will be applying for recent federal student loan forgiveness. If they are denied, Debtor(s) will pay student loans directly outside of the Plan.

Dated: <u>August 30, 2022</u>	/s/ Paul D. Murphy-Ahles			
	Attorney for Debtor			
	/s/ Douglas Stephen Taylor			
	Debtor 1			
	/s/ Noelle Denise Taylor			
	Debtor 2			

By filing this document, the Debtor, if not represented by an Attorney, or the Attorney for Debtor also certifies that this Plan contains no nonstandard provisions other than those set out in §9.

# UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Douglas Stephen Taylor
Debtor 1
Noelle Denise Taylor
Debtor 2

Chapter 13

Case No. 1:22-BK-00900-HWV

Matter: Second Amended Plan

### **NOTICE**

Notice is hereby given that:

The Debtor(s) filed a Chapter 13 Bankruptcy Petition on May 13, 2022.

A hearing on the above-referenced matter has been scheduled for:

United States Bankruptcy Court Ronald Reagan Federal Building Bankruptcy Courtroom (3<sup>rd</sup> Floor) Third & Walnut Streets Harrisburg, PA 17101

**Date: October 12, 2022** 

Time: 9:30 AM

Any objection/response to the above-referenced matter must be filed and served on or before **October 5**, 2022.

Evidentiary hearings will not be conducted at the time of the Confirmation Hearing. If it is determined at the Confirmation Hearing that an evidentiary hearing is required, an evidentiary hearing will be scheduled for a future date.

A copy of the Plan is enclosed with this Notice. A copy may also be obtained from the case docket through PACER or from the Bankruptcy Clerk's Office.

Request to participate in a hearing telephonically shall be made in accordance with Local Bankruptcy Rule 9074-1(a).

Date: September 2, 2022

Paul D. Murphy-Ahles, Esquire PA ID No. 201207 DETHLEFS PYKOSH & MURPHY 2132 Market Street Camp Hill, PA 17011 (717) 975-9446 pmurphy@dplglaw.com Attorney for Debtor(s)

# UNITED STATES BANKRUPTCY COURT MIDDLE DISTRICT OF PENNSYLVANIA

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Douglas Stephen Taylor
Debtor 1
Noelle Denise Taylor
Debtor 2

Chapter 13

Case No. 1:22-BK-00900-HWV

Matter: Second Amended Plan

### CERTIFICATE OF SERVICE

I hereby certify that on Friday, September 2, 2022, I served a true and correct copy of the **Second Amended Chapter 13 Plan and Notice of Opportunity to Object and Hearing** in this proceeding via electronic means or USPS First Class Mail upon the recipients as listed in the Mailing Matrix.

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P. Paralegal for Paul D. Murphy-Ahles, Esquire Label Matrix for local noticing Case 1:22-bk-00900-HWV Middle District of Pennsylvania Harrisburg Fri Aug 19 14:25:23 EDT 2022

U.S. Bankruptcy Court

Ronald leader Conic

Harrisburg, PA 17101-1737

Ally Bank c/o AIS Portfolio Services, LLC 4515 Nanta Ft Ave. Cepts AFF E

CBNA / Best Buy 50 Northwest Point Road Elk Grove Village, IL 60007-1032

Capital One Bank USA, NA PO BO3225PLICATE

Citadel Credit Union ATTN: Collections 520 Eagleview Blvd Exton, PA 19341-1119

Comenity Bank / Hot Topic Attn: Bankruptcy Department PO Box 182125 Columbus, OH 43218-2125

Country Door c/o Creditors Bankruptcy Service P.O. Box 800849 Dallas, TX 75380-0849

Fulton Bank, NA 1 Penn Square PO Box 4887 Lancaster, PA 17604-4887

LVNV Funding, LLC Resurgent Capital Services PO Box 10587 Greenville, SC 29603-0587

Ally Bank, c/o AIS Portfolio Services, LP Oklanoma city, on 73110

Abrahamsen Gindin, LLC 245 Main Street, Suite 100 Scranton, PA 18519-1641

Ally Financial, Inc. Ally Detrict Center 50 DUPALICATE Detroit, MI 48226-3416

CBNA / The Home Depot PO Box 6497 Sioux Falls, SD 57117-6497

(p) JPMORGAN CHASE BANK N A MONROE LA 71203-4774

Citibank, N.A. 5800 S Corporate Pl Sioux Falls, SD 57108-5027

Comenity Bank / Lane Bryant Attn: Bankruptcy Department PO Box 182125 Columbus, OH 43218-2125

Discover Bank New Albany, OH 43054-3025

Goldman Sachs Bank USA PO Box 70321 Philadelphia, PA 19176-0321

MECU Credit Union 1 South Street, 14th Floor Baltimore, MD 21202-3298

PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021

Ally Bank AIS Portfolio Services, LP 4515 N Santa Fe Ave. Dept. APS Oklahoma City, OK 73118-7901

Brickhouse OpCo I LLC 4053 Maple Road Suite 122 Amherst, NY 14226-1058

Capital One Bank (USA), N.A. by American InfoSource as agent PO Box 71083 Charlotte, NC 28272-1083

Citadel Credit Union 405 Feet Lincon Jinway TE Parkesburg, PA 19305-1778

Citibank, NA

Comenity Bank / One Stop Attn: Bankruptcy Department PO Box 182125 Columbus, OH 43218-2125

Discover Bank PO Box 3025 New Albany, OH 43054-3025

JPMorgan Chase Bank, N.A. s/b/m/t Chase Bank USA, N.A. c/o Robertson, Anschutz & Schneid, P.L. 6409 Congress Avenue, Suite 100 Boca Raton, FL 33487-2853

MECU of Baltimore

Filed 09/02/22 Entered 09/02/22 12:35:13 Doc 37 Desc Main Document Page 10 of 13

MERRICK BANK
Resurgent Capital Services
PO Box 10368
Greenville, SC 29603-0368

Mariner Finance 8211 Town Center Drive Nottingham, MD 21236-5904 Merrick Bank PO Box 9201 Old Bethpage, NY 11804-9001

(p)NATIONSTAR MORTGAGE LLC PO BOX 619096 DALLAS TX 75261-9096 OneMain Financial 601 NW 2nd Street PO Box 3251 Evansville, IN 47731-3251 OneMain Financial
PO 501211P L.J.CATE
Evansville, IN 47751-5251

PSECU 1500 Elmerton Avenue PO Box 67013 Harrisburg, PA 17106-7013 PSECU
PO BOX 67013
HAR DEBEN PA LI GATE

Pennsylvania Department of Revenue Bankruptcy Division PO Box 280946 Harrisburg, Pa. 17128-0946

(p) PORTFOLIO RECOVERY ASSOCIATES LLC
PORTFOLIO RECOVERY ASSOCIATES LLC

Seventh Avenue c/o Creditors Bankruptcy Service P.O. Box 800849 Dallas, TX 75380-0849

Seventh Avenue / Stoneberry

111 Otto PLICATE

Monroe, WI 53566-8045

Seventh Avenue / Swiss Colony

11 12 7 th Appul I CATE

Monroe, WI 53566-8045

Stoneberry c/o Creditors Bankruptcy Service P.O. Box 800849 Dallas, TX 75380-0849

Synchrony Bank

C/C PRA Receivables Canagement LLC
PC DAUGH LTC ATE

Norfolk, VA 23541-1021

Synchrony Bank / Care Credit
Attn: Bankruptcy Department
PORTOR DE CATE
Orlando, FL 32896-5060

TD Bank USA, N.A. C O WEINSTEIN & RILEY, PS 2001 WESTERN AVENUE, STE 400 SEATTLE, WA 98121-3132 (p)US DEPARTMENT OF HOUSING & URBAN DEVELOPME ATTN OFFICE OF REGIONAL COUNSEL THE WANNAMAKER BUILDING 100 PENN SQUARE EAST--11TH FLOOR PHILADELPHIA PA 19107-3325

US Department of Education Attn: Claims Filing Unit PO Box 8973 Madison, WI 53708-8973

United States Department of Education
Clap Gijp Lit CATE
PO Dox 9/3 PLICATE
Madison, WI 53708-8973

United States Trustee

228 rel ut rec, pur C N C

Harrisburg, PA 17101-1722

Douglas Stephen Taylor 407 Pauline Drive Red Lion, PA 17356-9676

(p) JACK N ZAHAROPOULOS
ATTN CHAPTED 12 TRUSTER
812 ALMS 50112 SULT RONG
HUMMELSTOWN PA 17036-8625

Noelle Denise Taylor 407 Pauline Drive Red Lion, PA 17356-9676 Paul Donald Murphy-Ahles
Det Life Proscience TRONIC
2132 Market Street
Camp Hill, PA 17011-4706

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Chase Card PO Box 15298 Wilmington, DE 19850 Nationstar Mortgage LLC P.O. Box 619096 Dallas, TX 75261-9741 (d)Nationstar Mortgage, LLC d/b/a Mr. Cooper PO Box 619096 Dallas, TX 75261-9741

Portfolio Recovery Associates, LLC POB 12914 Norfolk VA 23541 U.S. Department of Housing and Urban Develop 100 Penn Square East Philadelphia, PA 19107 Jack N Zaharopoulos (Trustee) Standing Chapter 13 Trustee 8125 Adams Drive, Suite A Hummelstown, PA 17036

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Commonwealth of Pennsylvania, Department o

(u) NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER

(d)Mariner Finance, LLC 8211 Town Center Drive Nottingham, MD 21236-5904

End of Label Matrix
Mailable recipients 56
Bypassed recipients 3
Total 59